UNITED STATES BANKRUPTCY COURT
DISTRICT OF SOUTH CAROLINA

In Re:	)	CASE NO. 17-00586-dd
	)	
Barry McKinley Stephens,	)	CHAPTER 11
	)	
	)	
Debtor.	)	
	)	
	)	

VERIFIED STATEMENT REQUIRED BY RULE 2019
OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE

Nelson Mullins Riley & Scarborough LLP ("Nelson Mullins"), pursuant to Federal Rule of Bankruptcy Procedure 2019(a), does hereby verify that it has been retained to represent more than one creditor in the above-captioned chapter 11 bankruptcy case (the "Bankruptcy Case"). Pursuant to Federal Rule of Bankruptcy Procedure 2019, Nelson Mullins provides the following information with respect to each of the creditors for which it has been retained:

1. RREF RB-SC Folly Beach, LLC (“RB-SC”)

   a. Address: c/o CT Corporation System
   2 Office Park Court, Suite 103
   Columbia, SC 29223

   b. Nature and Amount of Claim: RB-SC is a secured creditor of the Debtor by virtue of a charging order and lien granted by the Charleston County Court of Common Pleas. The amount of RB-SC's lien is $1,432,445.22.

   c. Reason for Representation: Nelson Mullins was retained to represent RB-SC in connection with all matters related to this Bankruptcy Case.

d. Timing of Representation and Disclosure of Claims of Interests: Nelson Mullins represents RB-SC on an ongoing basis in various matters, including its pre-petition collection efforts against the Debtor. Nelson Mullins does not own, nor has it ever owned, any claim whatsoever against the Debtor in this case, nor does it hold any equity securities of the Debtor.

2. Enterprise Bank of SC ("Enterprise Bank")

a. Address: 13497 Broxton Bridge Rd
Ehrhardt, SC 29081

b. Nature and Amount of Claim: Enterprise Bank is an unsecured creditor of the Debtor by virtue of a deficiency judgment. The amount of Enterprise Bank's claim is $61,335.62.

c. Reason for Representation: Nelson Mullins has been retained to represent Enterprise Bank in connection with all matters related to this Bankruptcy Case.

d. Timing of Representation and Disclosure of Claims of Interests: Nelson Mullins represents Enterprise Bank on an ongoing basis in various other matters. Nelson Mullins does not own, nor has it ever owned, any claim whatsoever against the Debtors in this case, nor does it hold any equity securities of the Debtors.

Nelson Mullins has considered and evaluated all potential conflicts of interest in accordance with applicable professional conduct rules and has determined that the representations are permissible and has obtained proper consents from its clients where required. Nelson Mullins reserves the right to amend and/or supplement this 2019 Statement at any time in the future.

NELSON MULLINS RILEY & SCARBOROUGH L.L.P.

By: /s/ B. Keith Poston

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Attorneys for RREF RB-SC Folly Beach, LLC and Enterprise Bank of SC

Columbia, South Carolina
April 20, 2017